REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 31-54 and 56-60 are pending in the present application, Claim 55 was previously canceled without prejudice. Claims 31 and 47 have been presently amended. No new matter was added as detailed below in the claim summary section.

In the outstanding Office Action, Claims 31-36 and 38-43 were rejected under 35 U.S.C. §102(a) as being anticipated by England (U.S. Patent No. 6,144,991 A), hereinafter referred to as England; Claims 47-48, 50-54 and 56-60 were rejected under 35 U.S.C. §102(e) as being anticipated by England; Claims 37, 44 and 46 were rejected under 35 U.S.C. §103(a) as being unpatentable over England as applied to Claims 31 and 38-39 and further in view of Tang et al (U.S. Patent No. 5,793,365), hereinafter referred to as Tang; Claim 45 was rejected under 35 U.S.C. §103(a) as being unpatentable over England and further in view of Kakuta et al (U.S. Patent No. 6,714,965 B2), hereinafter referred to as Kakuta; and Claim 49 was rejected under 35 U.S.C. §103(a) as being unpatentable over England as applied to Claim 47 and further in view of Tang et al.

Claim Summary, Claim 31 has been amended to define:

> A system for communicating over an open computer network, comprising:
>
> ***a management unit distributing data from a database to remote users;***
>
> a first terminal associated with a first user and configured to access a first information site and to acquire a client program from the management unit;
>
> said client program reads an internet address of the first information site in a web crawler of said first terminal;
>
> said client program sends a message to said management unit, said message includes the internet address of the first information site;
>
> said management unit is configured to access the database and determine a collection of web pages containing related information associated with the internet address of the first information site;

> said management unit is configured to identify a second user at second terminal accessing at least one of the web pages of the collection of said web pages containing related information associated with the internet address of the first information site and configured to receive an IP address of the second terminal;
>
> said first terminal is further configured to receive the IP address of the second terminal from the management unit and to conduct a communication from the first user to the second user based on the received IP address ***by way of exchange of respective IP addresses between the first and second terminals***,
>
> wherein said related information site is part of a same collection as the first information site, and
>
> the related information sites include at least one of identical information sites, information sites that are stored in the same place, information sites that have a same author, information sites that have a same specialty, and information sites that have a same publisher. [Emphasis added.]

Applicants disclose a method and system which permits a user to have access to other persons with interest in common. Such groups defined in the specification as "worlds" provides a basis for creation of contact between users on an open computer network. See specification, pages 10 and 11. The open computer network communication as shown in Applicants' Figure 2 is controlled by management system 26 including database 25, which serves as one example of the presently claimed management unit distributing data from a database to remote users.

The system and method of Claims 31 and 47 as clarified define the associating of an addressed Internet site (i.e., a first information site) with persons who are accessing the same web page or who are accessing a plurality of common web pages (i.e., the first and second users) and providing on that basis an identity of the users (i.e., the exchange of first and second IP addresses) for communication to each other on an open network by way of exchange of respective IP addresses between the first and second terminals.

The specification on page 9, line 22, to page 10, line 5, describes that the person searching information is given support to establish communication with other persons with the same interest, and that such communication possibilities include address information and immediate direct communication. The specification on page 11, lines 24-27, describes that

each user is registered in the management system with inter alia the IP address at which he/she is, and describes that this will facilitate communication between users and makes possible addressing also when dynamic IP-addressing is used.

Regarding the rejection on the merits, M.P.E.P. § 2131 requires for anticipation that each and every feature of the claimed invention must be shown in as complete detail as is contained in the claim. M.P.E.P. § 2143.03 requires, to establish a case of *prima facie* obviousness, all the claim limitations must be taught or suggested by the prior art.

In the outstanding Office Action, client-side component 904 in Figure 13 of England was associated with the acquisition of a client program from a management unit which the Office Action apparently associates with piper server 502. Thereafter, col. 15, lines 8-12, of England (which makes reference to Figure 12) was applied for an asserted disclosure of a first terminal configured to receive the IP address of the second terminal from the management unit and to conduct a communication from the first user to the second user based on the received IP address. A more comprehensive discussion of col. 15, lines 8-12, of England is presented below, but first Figures 12 and 13 of England are reproduced below for the sake of convenience.

FIG. 12

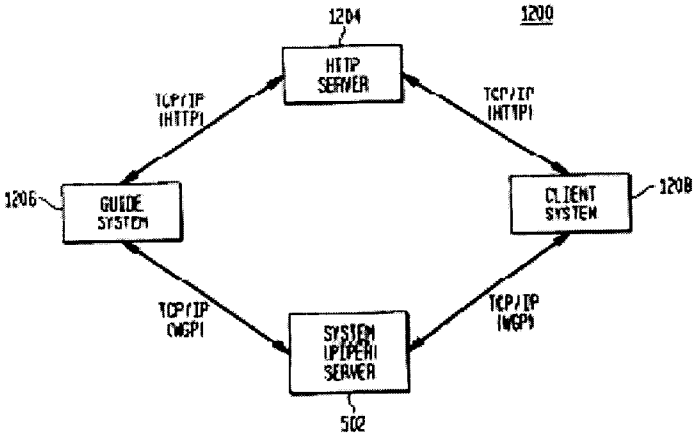
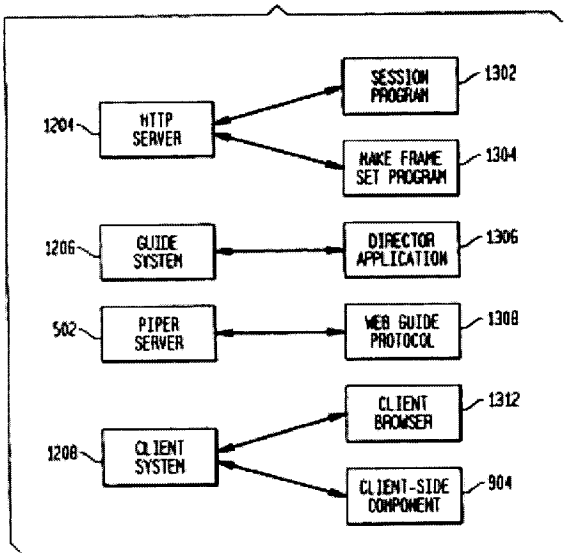


FIG. 13



Col. 14, line 65, to col. 15, line 21, of England describes:

> FIG. 12 shows a high-level block diagram of one illustrative embodiment of the Hamelin system 1200, a system for managing interactions between users (i.e. guides and clients) in a browser-based telecommunications network. System 1200 includes the following elements: system (piper) server 502; HTTP server 1204; at least one guide system 1206; and at least one client system 1208. With reference to FIG. 1 for comparison and contrast, the arrangement of system 1200 provides a logical view of the system in accordance with the present invention, as distinct from a physical implementation. In terms of actual physical implementation, communication via the browser-based network among servers 502 and 1204 and guide system 1206 and client system 1208 ***uses packets propagating serially*** based upon the TCP/IP protocol. But, note that guide system 1206 ***only communicates*** directly with HTTP server 1204 and system server 502; server 502 ***only communicates*** directly with guide system 1206 and client system 1208; client system 1208 ***only directly communicates*** with servers 1204 and 502; and, finally, server 1204 ***only communicates directly*** with systems 1206 and 1208. Accordingly, system 1200 represents a logical model for the inter-element communications, with the direct communication paths shown as separate logical paths.

Hence, the propagation of packets in the system 1200 of England is serially from client system to server (i.e., HTP server or Piper Server) to the guide system. Multiple users would presumably access the system 1200 of England all through the client system 1208. As such, the HTTP and TCP protocols would only provide for communications serially between

respective users and the HTP server or Piper Server. There would be no reason in this communication system to exchange IP address data between different users.

In other words, while the different IP addresses of the client system 1208, the HTP server 1204, the Piper Server 502, and the guide system 1206 would presumably be exchanged under the TCP or HTTP protocols, such an occurrence would not constitute an exchange of IP addressees between different users, as presently defined in independent Claims 31 and 47.

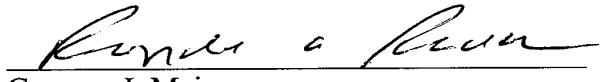
Hence, England fails to disclose the system or method recited in Claims 31 and 47, respectively. Furthermore, the deficiencies in England are not overcome by Tang and Kakuta.

In view of the above-noted distinctions, Applicants respectfully submit that Claim 31 (and the claims dependent thereon) patentably distinguish over the applied references. Furthermore, Claim 47, although of a different statutory class, is similar to Claim 31. Applicants respectfully submit that Claim 47 (and the claims dependent thereon) patentably distinguish over the applied references, for at least the reasons stated for Claim 31.

Consequently, in light of the above discussion and in view of the present amendment, the present application is believed to be in condition for allowance and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,
MAIER & NEUSTADT, P.C.



Gregory J. Maier
Attorney of Record
Registration No. 25,599
Ronald A. Rudder
Registration No. 45,618

Customer Number
22850

Tel: (703) 413-3000
Fax: (703) 413 -2220
(OSMMN 06/04)
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